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SUBJECT: Submits info re plans to reload fuel into reactor upon completion of certain prerequisites established by TVA.

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JUL 06 1988

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Gentlemen:

In the Matter of) Docket No. 50-260
Tennessee Valley Authority)

BROWNS FERRY NUCLEAR PLANT (BFN) - PREREQUISITES FOR FUEL RELOADING

This letter provides information regarding TVA's plans to reload fuel into the unit 2 reactor at the BFN plant upon completion of certain prerequisites presently being established by TVA. Fuel loading is now the next major milestone in TVA's plan of actions to complete the current outage and restart the BFN Unit 2 reactor. TVA's overall plan for the restart of the unit 2 reactor has been described in its Nuclear Performance Plan Vol. 3 and in several related submittals. In recent meetings, TVA has discussed its technical verification program (including the Restart Test Program) and its plans for a Site Master Punchlist (SMPL) to aid in the closeout of open items. TVA has also reviewed with NRC its fuel inspection and reconstitution activities presently underway at BFN, and NRC issued a safety evaluation that approved these activities.

To prepare for the commencement of fuel reconstitution, it was necessary to verify that work on the systems required to be operable by the unit 2 technical specifications (TSs) was complete to the point that the systems could be declared operable. To accomplish this with the necessary degree of discipline and documentation, TVA developed and implemented a special procedure that established control over the required equipment and portions of systems as needed to support fuel reconstitution activities.

The objectives of TVA's plans for fuel reloading are to complete a systematic evaluation of known restart issues and deficiencies, establish prerequisites, and complete specific work required to ensure fuel loading is conducted in a safe and reliable manner. To control the completion of work, TVA issued a set of system return-to-service procedures and system pre-operability checklists for restart. These procedures will be used to ensure that the systems required for fuel loading can be declared operable in accordance with TS requirements. TVA is also proceeding with the development of SMPL which is a punchlist of actions items that must be completed for restart. SMPL will have the capability to list open action items required to be completed for a key milestone to be achieved, for a system to be declared operable or for a technical program or licensing issue to be closed. Thus, TVA will have the

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ability through its procedures and the use of SMPL to evaluate, control, and verify the completion of critical action items for any of the remaining major restart milestones. The key control procedures are provided in enclosure 1.

Implementation of these procedures will result in a list of systems that are targeted to be completed, tested, and made operable to support fuel loading operations. TVA's procedures for return-to-service are very comprehensive in the identification of programmatic issues, known open items, and maintenance or modifications work that must be completed on each of the systems required to meet TS requirements. These procedures also permit exceptions to be made to the system pre-operability checklist, the system test specifications, and the system return-to-service requirements, provided that an appropriate justification is prepared and approved. Exceptions to requirements specified for each system will be evaluated for safety significance based on the plant conditions and to ensure that they would not result in a deviation from TS requirements.

Inherent in the system pre-operability checklists and the return-to-service procedure is the completion of certain TVA restart programs to a point necessary for commencement of fuel reloading operations. With respect to each TS required system, TVA's intent is to complete modifications, correct identified deficiencies, and complete work requests that impact the safety function or system operability as required for fuel reloading. Deficiencies discovered during completion of TVA's restart program will be evaluated based on the Restart Criteria and TS operability requirements. Corrective actions, if appropriate, will be scheduled for completion through TVA's work control procedures.

In summary, TVA places importance on the achievement of fuel reloading as a major step in the evolution of restart activities from a mode with design and modification emphasis to a mode in which operational control is reestablished and systems are returned to service and maintained in a safe and orderly fashion. The activities and procedures being implemented by TVA will ensure that fuel loading is conducted in a safe and reliable manner. Fuel reloading operations are presently scheduled to begin September 1, 1988.

U.S. Nuclear Regulatory Commission JUL 06 1988

If you have any questions or require additional information to prepare for the forthcoming meeting, please telephone M. J. May at (205) 729-3570.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. Gridley, Director
Nuclear Licensing and
Regulatory Affairs

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ENCLOSURE 1

PROCEDURES TO BE USED FOR
SYSTEM RETURN TO SERVICE AT BROWNS FERRY NUCLEAR PLANT

Copies of the following listed procedures are provided in this enclosure.

SDSP 12.4	"SYSTEM RETURN TO SERVICE AND CLOSURE OF MODIFICATIONS"
SDSP 12.7	"SYSTEM PREOPERABILITY CHECKLIST"